

FILED

APR 07 2025

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

) I N F O R M A T I O N

Plaintiff,

)

v.

) CASE NO.

PAUL JACKSON,

4 :25 CR 00158

) Title 18, United States Code,
Section 1343

Defendant.

)

JUDGE CALABRESE

GENERAL ALLEGATIONS

At all times relevant to this Information unless otherwise specified:

1. Defendant PAUL JACKSON resided in Youngstown, Ohio, in the Northern District of Ohio, Eastern Division.
2. Online Auction Site 1 was an online e-commerce company based in San Jose, California, that allowed users to buy and sell items through its online marketplace, either via online auctions or direct sales.

COUNT 1-2
(Wire Fraud, 18 U.S.C. § 1343)

The Acting United States Attorney charges:

3. The factual allegations of paragraphs 1 and 2 of this Information are re-alleged and incorporated by reference as if fully set forth herein.

The Scheme to Defraud

4. From in or around November 2017 through in or around August 2021, Defendant PAUL JACKSON, with the intent to defraud, did devise, and did intend to devise, a scheme to defraud and to obtain money from the Online Auction Site 1 by means of false and fraudulent

pretenses, representations and promises, and transmitted or caused to be transmitted by means of wire communications in interstate commerce writings, signs, signals, pictures or sounds for the purpose of executing the scheme to defraud.

5. The purposes of the scheme to defraud included, but were not limited to, the following: for Defendant to unjustly enrich himself and others by purchasing items with fraudulently-lowered prices and obtaining refunds under false pretenses, and to prevent detection of the scheme to defraud.

Manner and Means of the Scheme

6. The manner and means by which Defendant carried out the scheme to defraud included, but were not limited to, the following:

a. Defendant fraudulently caused Online Auction Site 1 to adjust prices of particular items for sale, which Defendant then purchased at lower prices, causing a loss to Online Auction Site 1.

b. Defendant fraudulently caused Online Auction Site 1 to issue refunds for items he purchased and retained, causing a loss to Online Auction Site 1.

Acts in Furtherance of the Scheme

7. The acts caused by Defendant in furtherance of the scheme, in the Northern District of Ohio, Eastern Division, and elsewhere, included, but were not limited to, the following:

Fraudulent Price Adjustments

8. From in or around November 2017 through in or around June 2020, Defendant called Online Auction Site 1's customer service phone number posing as the seller of certain items listed for sale, in each instance providing the information needed to verify his identity as the seller of the particular item.

9. Defendant requested, as the purported seller, that the price of a particular item be lowered, and provided the customer service representative with the item number and lower price.

10. Defendant then purchased the item himself at the lower price.

11. As a result of Defendant's reasonably foreseeable fraudulent conduct related to price adjustments, Online Auction Site 1 reimbursed sellers for approximately \$22,164.23 in losses, the difference between the seller's true price and the lower price Defendant had set by misrepresenting himself as the seller.

Fraudulent Refunds

12. From in or around July 2020 through in or around August 2021, Defendant purchased items via Online Auction Site 1 and obtained fraudulent refunds for items he kept.

13. After Defendant made a purchase via Online Auction Site 1 and after the item was shipped, Defendant called Online Auction Site 1's customer service line posing as the item's seller.

14. Defendant told the customer service representative that he was trying to process a customer refund, but had received an error message, and asked the representative to issue the refund for him.

15. Defendant received the refund from Online Auction Site 1 and retained the item he purchased.

16. As a result of Defendant's fraudulent conduct related to refunds, Online Auction Site 1 reimbursed sellers for approximately \$7,758.22 in losses.

Execution of the Scheme

17. On or about the following dates, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant PAUL JACKSON, for the purpose of executing the scheme described above, and attempting to do so, caused to be transmitted by means of wire

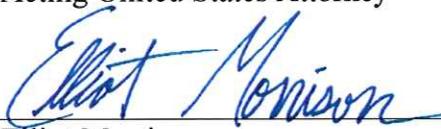
communication in interstate commerce the following writings, signs, signals, pictures and sounds, each transmission sent from the State of Ohio and routed across state lines, and each transmission representing a separate count of this Information:

Count	Approximate Date	Transaction type
1	5/20/20	Fraudulent price adjustment
2	4/2/21	Fraudulent refund

All in violation of Title 18, United States Code, Section 1343.

CAROL M. SKUTNIK
Acting United States Attorney

By:


Elliot Morrison
Chief, White Collar Crimes Unit